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NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

Leed Environmental, Inc.
124 Deborah Drive
Reading, PA 19610
Telephone: (610) 670-7310
Telecopy: (610) 670-7311

September 2, 2004

First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

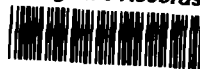
**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Progress Report 64 (August 2004)**

Dear Mr. Bradley:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the "site"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") to provide the U.S. Environmental Protection Agency ("EPA") with a progress report for operation and maintenance activities that were performed during August 2004.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- On August 2, 2004, the Group's project coordinator issued a progress report to EPA.
- On or about August 2, 2004, the Group's project coordinator and EPA's project manager discussed operation and maintenance issues at the site. Following the discussion, the Group's project coordinator requested that ENTACT inspect erosion areas on the Taracorp pile cap. ENTACT checked the erosion areas on August 2, 2004 and advised the Group's project coordinator that heavy rainfall caused the washout of areas on the cap that were repaired in June 2004. The Group's project coordinator authorized ENTACT to make the additional repairs.
- On August 5, 2004, the Group's project coordinator received a request from EPA's Supplemental Environmental Project ("SEP") project manager for a conference call to discuss the soil sampling methodology in the SEP Work Plan.



- On August 16, 2004, representatives of the Group, EPA, and the Madison County Community Development Agency participated in a conference call related to the SEP Work Plan. Following the conference call, EPA's SEP project manager provided a memorandum to the Group's project coordinator that included EPA's recommended modifications to the SEP Work Plan and the Internet address for EPA's "Superfund Lead-Contaminated Residential Sites Handbook." The Group's project coordinator provided EPA's comments to the Madison County Community Development Agency for review.
- On August 16, 2004, the Group's project coordinator received an electronic version of a letter from EPA's SEP project manager providing EPA's approval of the SEP Work Plan with modifications. The Group's project coordinator provided a copy of EPA's letter to the Madison County Community Development Agency for review.
- On August 31, 2004, the Madison County Community Development Agency submitted a revised final version of the SEP Work Plan to EPA to address EPA's August 16, 2004 comments.
- During August 2004, the Madison County Community Development Agency continued to prepare for the public kick-off event related to the *implementation of the SEP*.

2. **Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**

- As noted above, the Madison County Community Development Agency submitted a revised final version of the SEP Work Plan to EPA on August 31, 2004 to address EPA's August 16, 2004 comments.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- As reported in previous monthly progress reports, ENTACT remobilized to the site in June 2004 and completed repairs to erosion areas on the Taracorp pile cap. Based upon subsequent information provided by EPA's project manager in August 2004, ENTACT inspected the Taracorp pile cap in August 2004 and determined that heavy rainfall caused the washout of areas on the

cap that were repaired in June 2004. At the present time, the Group anticipates that the repairs of the erosion areas on the Taracorp pile cap, as well as some additional fence repairs, will be completed in September 2004.

- The Madison County Community Development Agency will continue to prepare for a public kick-off event for the SEP in September 2004.
- Upon receipt of "model language" from EPA, the Group will continue efforts to establish institutional controls for the Taracorp pile property.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- As noted above, EPA approved the SEP Work Plan on August 16, 2004, with modifications.

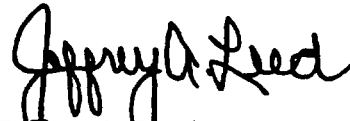
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- As noted above, the Group anticipates that the Madison County Community Development Agency will conduct the public kick-off event for the SEP in Granite City in September 2004. At the present time, the Group understands that the kick-off event is tentatively scheduled for September 22, 2004, subject to the availability of the meeting location in Granite City.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

Mr. Brad Bradley
September 2, 2004
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cc: Ms. Sandra Bron - Illinois EPA (by first class mail)
Mr. Rich Wood - ENTACT, Inc. (by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(by first class mail)